Flyway Property Removal Action Work Plan Addendum June 2003

Section 2A-Summary of Work Completed in 2001

As a second addendum to the Flyway Property Final Removal Action Work Plan, August 14, 2001, the following is a brief summary of work completed in 2001 and 2002.

Sixteen (16) grids, approximately 160,000 square feet (3.37 acres), were excavated during the 2001 construction season. Soil was excavated to a minimum depth of 18 inches below existing grade. In areas where visible product was encountered, contaminated soils were removed to depths of several feet until visible material was no longer present and/or confirmation sample results were <1%. Asbestos containing soils were disposed of at the abandoned mine site.

Trees equal to or greater than 6 inches in diameter at a point 4 feet above ground surface were protected from damage during soil excavation, backfilling, and restoration activities. Trees less than 6 inches in diameter at a point 4 feet above ground surface were cut into manageable size pieces and stockpiled by the removal contractor.

Soil sampling conducted subsequent to issuing the 2001 Flyway Removal Action Work Plan (RAWP) indicated approximately 28 grids (Flyway grids measure 100 ft by 100 ft) required excavation for the 2002 construction season.

Section 2B-Summary of Work Completed in 2002

Although no excavation work occurred during the 2002 construction season, additional sampling and investigative activities took place. The entire property was inspected for visible vermiculite contamination at the surface. Samples from grids not previously investigated and without visible vermiculite at the surface were collected and analyzed by the PLM method.

Based on previous excavation activities, sampling results, and the 2002 ~~other~~ investigative activities, thirty-six (36) grids will need to be excavated in order to complete the removal activities in 2003.

Section 3A-Summary of Work Planned for 2003 (New for the Addendum)

A.3.1 Planning Activities

A.3.1.1 Introduction

Where relevant, the Engineering Drawings and Technical Specifications developed in 2000 for the removal activities at the former screening plant (Operable Unit 02) will remain in effect for the 2003 construction season.

A.3.1.2 Health and Safety Plan Requirements

The contractor will provide a Comprehensive Health and Safety Plan (HASP) for the site work. The HASP will be reviewed and approved by the Government or designated project Certified Industrial Hygienist (CIH) and/or Site Health and Safety Officer prior to being implemented.

A.3.1.3 Air Monitoring Requirements

Air monitoring requirements, including subsections, for the 2003 construction season will follow the same procedures conducted in the 2001 construction season and as outlined in the Flyway Property Final Removal Action Work Plan, August 14, 2001. [Do we limit to perimeter and occasional task based sampling?]

A.3.1.4 Sampling and Quality Assurance Project Plan

The text portion of the Sampling and Quality Assurance Project Plan developed by the EPA is provided in Appendix B of the Screening Facility, Final Removal Action Work Plan, August 14, 2001. Applicable requirements of this plan will be implemented during the activities conducted in 2003.

A.3.1.5 Decontamination and Dust Suppression Requirements

Personnel and construction equipment decontamination requirements will follow the same procedures conducted in the 2001 construction season and as outlined in the Flyway Property Final Removal Action Work Plan, August 14, 2001.

Dust suppression procedures as outlined in the Flyway Property Final Removal Action Work Plan, August 14, 2001 will also be conducted in the 2003 construction season.

A.3.1.6 Supplemental Soil Sampling

Supplemental Soil Sampling as outlined in the Flyway Property Final Removal Action Work Plan, August 14, 2001 may also be conducted in the 2003 construction season, as required.

A.3.1.7 Engineering Drawings and Technical Specifications

The technical specification sections, including revisions, outlined in the Flyway Property Final Removal Action Work Plan, August 14, 2001, will be implemented during the 2003 construction season.

A.3.1.8 Erosion Control

Erosion controls installed in 2001 will be maintained during the 2003 construction season and additional erosion control will be installed in accordance with the Flyway Property Final Removal Action Work Plan, August 14, 2001. ~~Installation of erosion controls will follow the same procedures that were conducted in the 2001 construction season~~.

A.3.1.9 Final Site Restoration

The KDC Flyway property will be restored to original grade. Restoration of the Flyway includes placing fill that has been previously sampled to be asbestos-free. Final grading shall be performed in a manner such that all disturbed areas of the property are restored to the original contours.

A.3.2 Removal Activities

A.3.2.1 Contractor Mobilization

Contractor mobilization, including office trailer, decontamination trailer, and lavatory facilities shall be similar to those provided in the 2001 construction season. Mobilization shall begin upon notice to proceed.

A.3.2.2 Temporary Facilities

Temporary facilities will include, at minimum, one (1) field office trailer for project management, the site superintendent, and the field crew. Portable toilets, temporary water source and chain link fencing shall be set up as outlined in the Flyway Property Final Removal Action Work Plan, August 14, 2001 and follow the same procedures that were conducted in the 2001 construction season.

A.3.2.3 Decontamination Facilities

The removal contractor shall provide personnel decontamination facilities as outlined in the Flyway Property Final Removal Action Work Plan, August 14, 2001 and follow the same procedures that were conducted in the 2001 construction season.

Equipment decontamination facilities will also be required on the Flyway property and on the haul road to the mine site.

A.3.2.4 Tree Protection and Removal

Tree protection and removal will follow the same procedures that were conducted in the 2001 construction season and as outlined in the Flyway Property Final Removal Action Work Plan, August 14, 2001.

A.3.2.5 Soil Excavation and Disposal

36 grids remain to be excavated in 2003. Figure A-1 shows the approximate limits of soil excavation planned for the 2003 construction season. Soil in the identified locations will be excavated to a depth of 18 inches below existing grade. At the 18-inch depth, confirmatory soil samples will be collected and analyzed for asbestos by the PLM method. If asbestos is found at levels requiring removal (>1percent), excavation and soil removal with confirmatory sampling will continue to a depth of 4 feet. Maximum soil excavation will be to 4 feet below existing grade.

Riverbank contaminated soil along the Kootenai Riverbank will be excavated to a depth of 18 inches. The riverbank will be backfilled with approved fill material. Class II Riprap will be used in accordance and as specified in the Montana DOT Standard Specifications for Road and Bridge Construction, 1995, as amended.

GPS coordinates of each sample point and corresponding analytical results will be entered into the EPA project database. The excavated soil will be transported by tarped truck to the abandoned mine site.

A.3.2.6 Transformer Removal and Disposal

The transformer outside of the pump house was sampled non-detect for PCBs. Soils in the vicinity of the transformer will be sampled and analyzed in accordance with the Flyway Property Final Removal Action Work Plan, August 14, 2001.

A.3.2.7 Transportation and Disposal Considerations

Transport and disposal of contaminated soil removal and demolition waste from the KDC Flyway property will be conducted by tarped truck in accordance with the Flyway Property Final Removal Action Work Plan, August 14, 2001.

A.3.2.8 Backfilling and Final Grading

Backfill material shall be sampled and analyzed by PLM to confirm ~~show~~ it is~~as~~ asbestos-free. The site shall be graded to restore original contours.

A.3.2.9 Topsoil and Hydroseeding

Topsoil and hydroseeding activities will not be required for the restoration of the Flyway property. However, erosion control measures will be implemented.

A.3.2.10 Final Site Restoration

Final restoration of the KDC Flyway property will include erosion control, decontamination of the pump station building and its contents, sampling and possible disposal/incineration of the electric transformer, sampling and possible disposal of PCB contaminated soils at an approved landfill, tree and stump removal, removal of asbestos contaminated soil to the depths established by the Government; furnishing, placing and compacting common fill, granular fill for roadways, ~~topsoil and hydroseeding;~~ and restoring the site to original grades as indicated in the Flyway Property Final Removal Action Work Plan, August 14, 2001.

A.3.2.11 Mine Maintenance

Mine maintenance requirements shall follow the same procedures conducted in the 2001 construction season. This includes but is not limited to, dust suppression on Rainy Creek Road, staffing and operating the contaminated material transfer station, and handling contaminated material at the abandoned mine disposal location.

Color Map(s)

The following pages contain color that does not appear in the scanned images.

To view the actual images, please contact the Superfund Records Center at (303) 312-6473.

Libby, Montana

KDC Flyway Property Removal Results And Clean Sampling Grids

Asbestos Levels In Soil (by PLM)

Surface Samples

- ○ No Data
- ● ND
- ● <1%
- ○ 1%
- ○ 2%
- ○ 3%
- ● 4%
- ● ≥5%

Approximate Flyway Property Boundary

100 FT Grid Tile

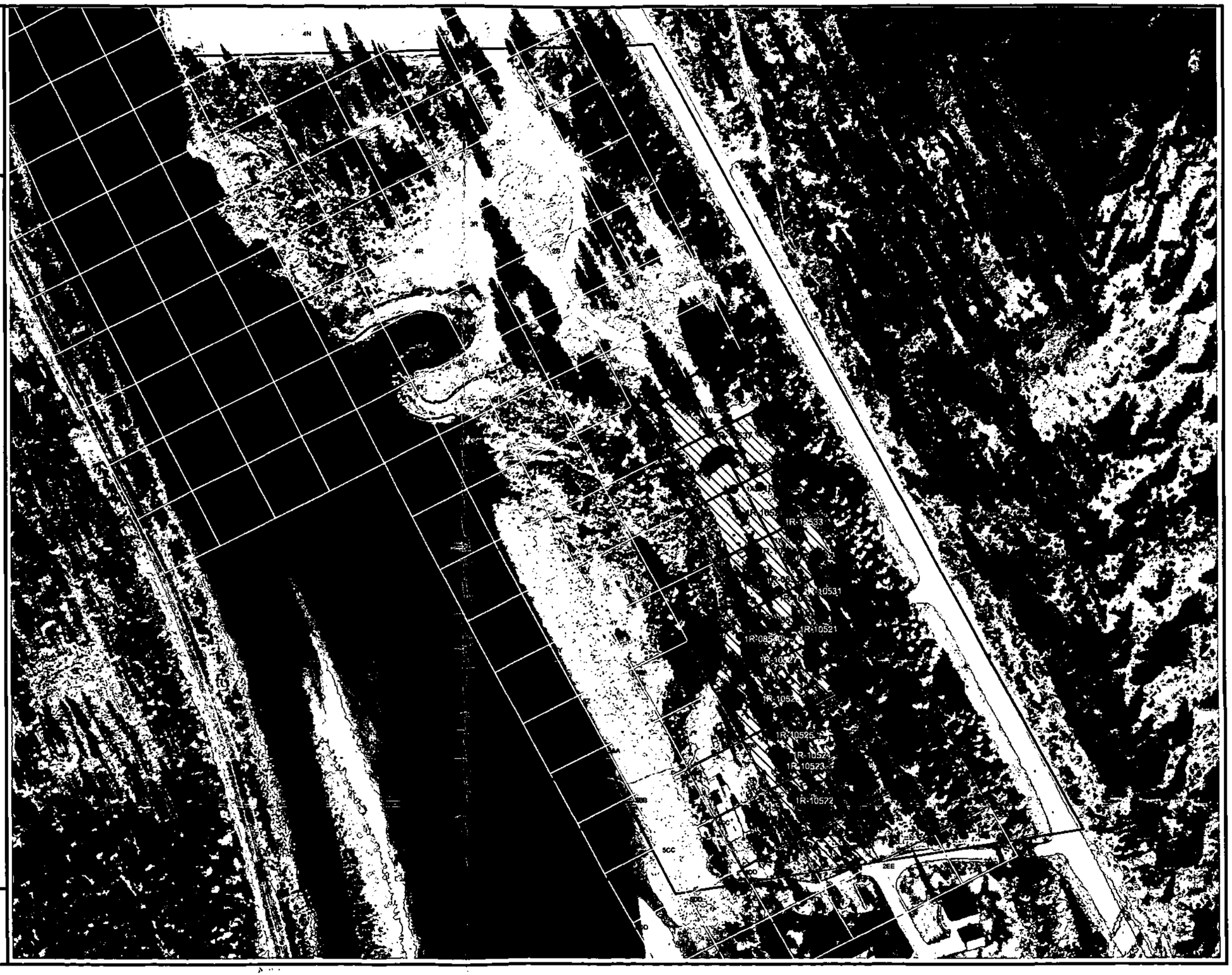
Clean Grids

Cleaned Grids Containing Areas of Excavation

N
W E
S

CDM

150 0 150 Feet



Libby, Montana

KDC Flyway Property Removal Results And Clean Sampling Grids

Asbestos Levels In Soil (by PLM)

Surface Samples

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- ● ≥5%

Approximate Flyway Property Boundary

100 FT Grid Tile

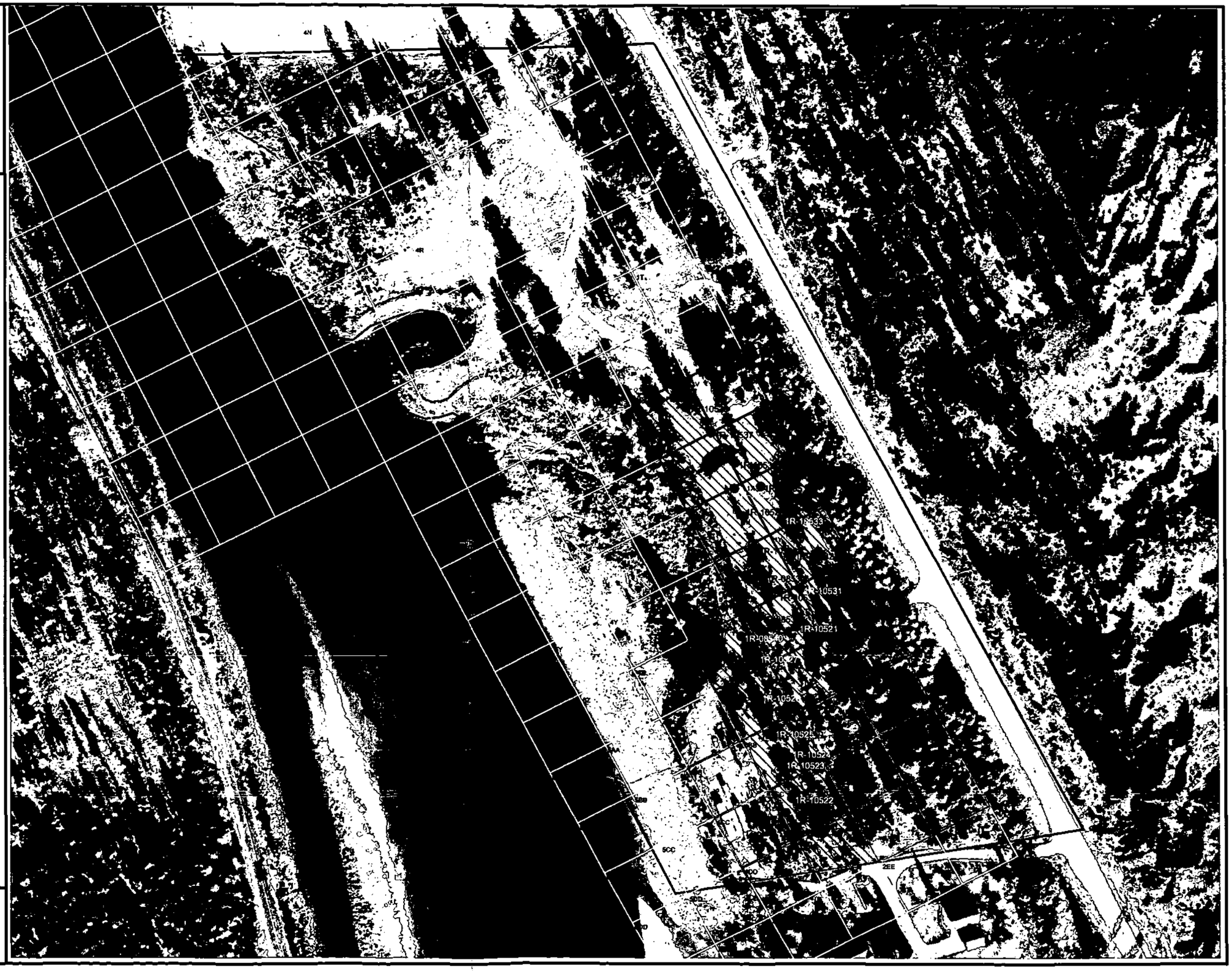
Clean Grids

Cleaned Grids Containing Areas of Excavation

N
W E
S

CDM

150 0 150 Feet



Libby, Montana

KDC Flyway Property
Pre-Removal Soil Results
And Sampling Grid

Asbestos Levels
In Soil (by PLM)

Surface Samples
- No Data
- ND
- <1%
- 1%
- 2%
- 3%
- 4%
- ≥5%

Depth Samples
- No Data
- ND
- <1%
- 1%
- 2%
- 3%
- 4%
- ≥5%

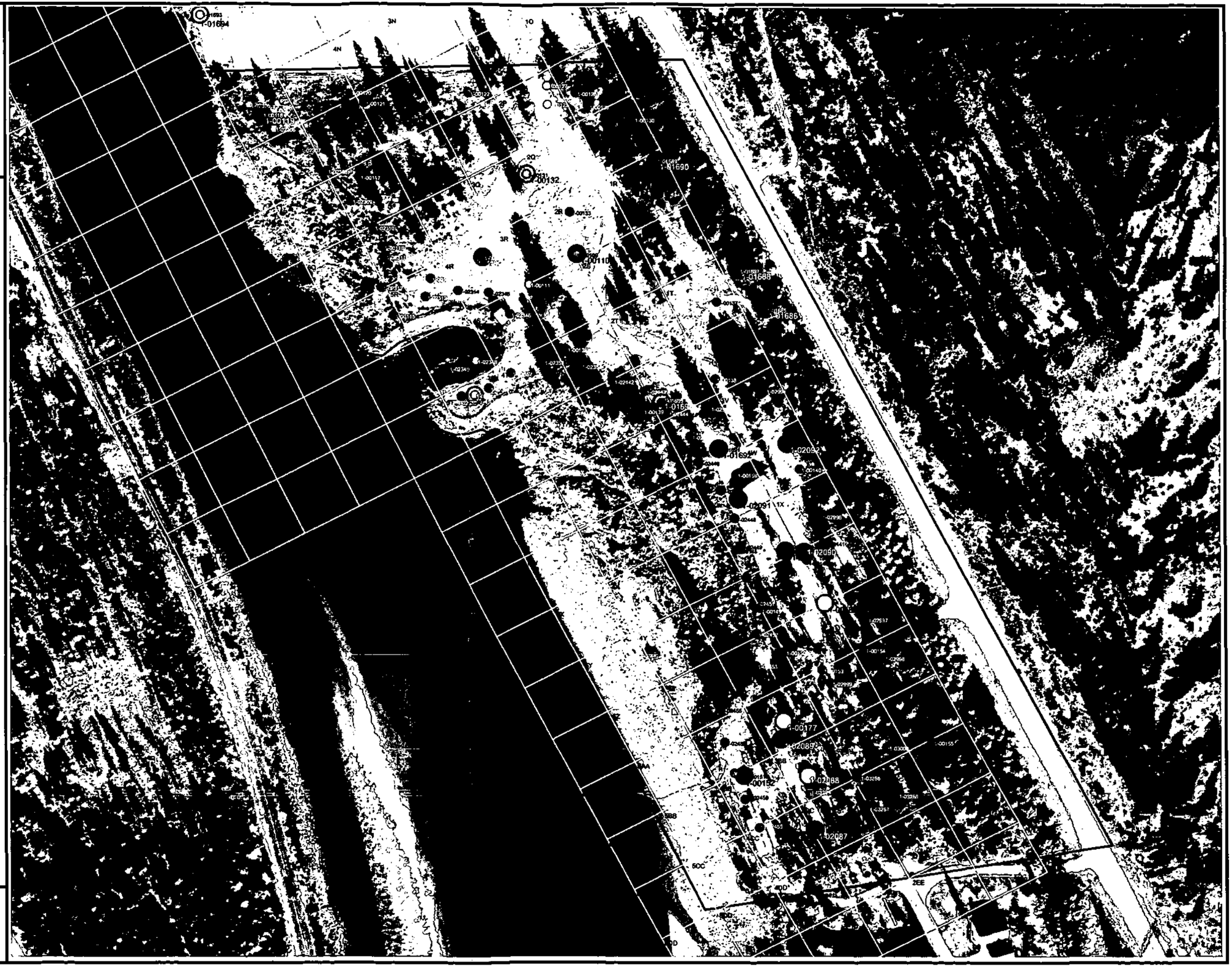
N
W E
S

Approximate Flyway Property Boundary

100 FT Grid Tile

CDM

150 0 150 Feet



Libby, Montana

KDC Flyway Property
Pre-Removal Soil Results
And Sampling Grid

Asbestos Levels In Soil (by PLM)

Surface Samples
- ○ No Data
- ● ND
- ● <1%
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- ○ 2%
- ○ 3%
- ● 4%
- ● ≥5%

Depth Samples
- ○ No Data
- ● ND
- ● <1%
- ○ 1%
- ○ 2%
- ○ 3%
- ● 4%
- ● ≥5%

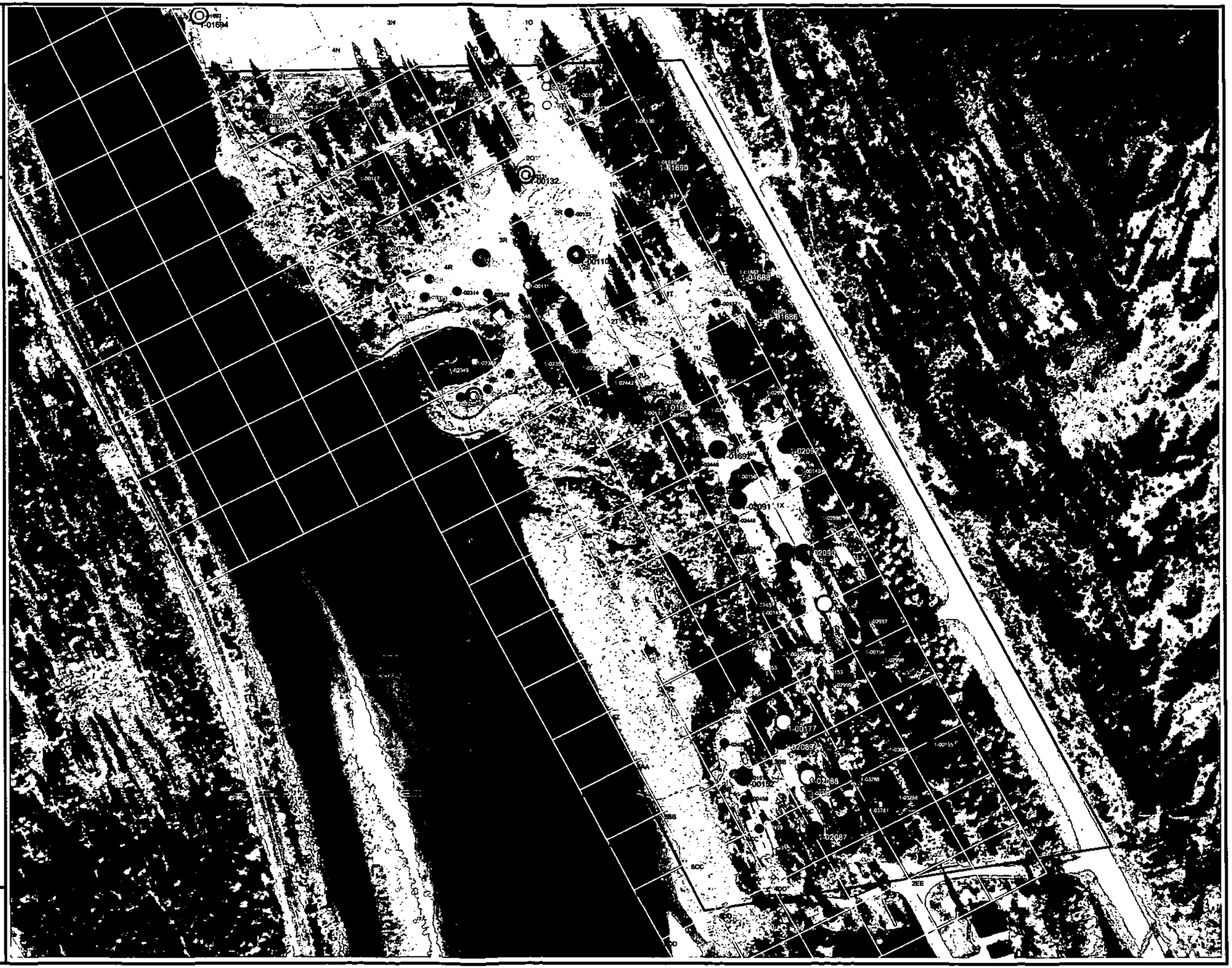
N
W E
S

Approximate Flyway Property Boundary

100 FT Grid Tile

CDM

150 0 150 Feet



Libby, Montana

KDC Bluff
Pre-Removal Soil Results
And Sample Grid

Asbestos Levels
In Soil (by PLM)

Surface Samples

- No Data
- ND
- <1%
- 1%
- 2%
- 3%
- 4%
- ≥5%

Depth Samples

- No Data
- ND
- <1%
- 1%
- 2%
- 3%
- 4%
- ≥5%

Approximate Flyway

Property Boundary

100 FT Grid Tile

CDM

200 0 200 400 Feet

Libby, Montana

KDC Bluff
Pre-Removal Soil Results
And Sample Grid

Asbestos Levels
In Soil (by PLM)

Surface Samples

- ○ No Data
- ● ND
- ◐ <1%
- ○ 1%
- ○ 2%
- ○ 3%
- ● 4%
- ● ≥5%

Depth Samples

- ○ No Data
- ● ND
- ◐ <1%
- ○ 1%
- ○ 2%
- ○ 3%
- ● 4%
- ● ≥5%

Approximate Flyway Property Boundary

100 FT Grid Tile

CDM

200 0 200 400 Feet

Libby, Montana

KDC Bluff
Removal Results
And Sampling Grid

Asbestos Levels
In Soil (by PLM)

Surface Samples
- ○ No Data
- ● ND
- ● <1%
- ○ 1%
- ○ 2%
- ○ 3%
- ● 4%
- ● ≥5%

Depth Samples
- ○ No Data
- ● ND
- ● <1%
- ○ 1%
- ○ 2%
- ○ 3%
- ● 4%
- ● ≥5%

Approximate Flyway Property Boundary

100 FT Grid Tile

CDM

250 0 250 Feet

Libby, Montana

KDC Bluff
Removal Results
And Sampling Grid

Asbestos Levels
In Soil (by PLM)

Surface Samples
- No Data
- ND
- <1%
- 1%
- 2%
- 3%
- 4%
- ≥5%

Depth Samples
- No Data
- ND
- <1%
- 1%
- 2%
- 3%
- 4%
- ≥5%

Approximate Flyway Property Boundary

100 FT Grid Tile

CDM

250 0 250 Feet